



June 27, 2019

Via Electronic Filing

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* – Misuse of Internet Protocol (IP) Captioned Telephone Service, CG Docket No. 13-24; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

On June 25, 2019, the undersigned of InnoCaption met with Michael Carowitz, Special Counsel to Chairman Pai; Arielle Roth, Legal Advisor to Commissioner O’Rielly; Diane Burstein, Robert Aldrich, Eliot Greenwald, Michael Scott, and Douglas Graebner of the Consumer and Governmental Affairs Bureau (CGB); Susan Lee of the Office of Economics and Analytics (OEA); and Andrew Multz of the Office of Managing Director (OMD).¹ On June 26, 2019, Cristina Duarte met with Jamie Susskind, Chief of Staff and Legal Advisor to Commissioner Carr.

During the meetings, InnoCaption discussed its pending Emergency Petition for Interim Waiver of the 2019-20 IP CTS compensation rate adjustment adopted in the *IP CTS Modernization and Reform Order*.² More specifically, given the company’s status as an emergent provider and the importance of fostering competition in the IP CTS marketplace, InnoCaption respectfully urged the Commission to freeze the company’s compensation rate at \$1.75 per minute, until a permanent rate-setting methodology is implemented in the ongoing rulemaking proceeding. For this purpose, InnoCaption believes that it would be appropriate to define an emergent IP CTS provider as any provider with a monthly call volume of one million

¹ Paul Lee, a consultant for InnoCaption, participated by telephone in the meeting with CGB, OEA, and OMD.

² See InnoCaption Emergency Petition for Interim Waiver, CG Docket Nos. 13-24 and 03-123 (filed June 14, 2019) (“Waiver Request”); *Misuse of Internet Protocol Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing Loss and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd 5800 at ¶ 26 (2018).

minutes or less. In addition, should the Commission grant the Waiver Request after the rate reduction goes into effect, InnoCaption requested that the waiver apply retroactively to July 1, 2019.

This notice is filed in accordance with Section 1.1206(b) of the Commission's rules.³

Respectfully Submitted,

/s/ Cristina O. Duarte

Cristina O. Duarte

Director of Regulatory Affairs

MezmoCorp (dba InnoCaption)